

# **EXHIBIT “A”**

# THE BEASLEY FIRM, LLC

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30 January 2019

### VIA ELECTRONIC AND FIRST CLASS MAIL

Timothy M. Kolman, Esq.  
Kolman Ely, P.C.  
414 Hulmeville Avenue  
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**Re: Bose v. LVFA**

Mr. Kolman:

I have yours of January 28, 2019 in hand. We get to depose your client because you withheld hundreds of pages of documents from us, and after you brought them to the conference, Judge Wells was pretty clear that Mr. Bose would have to be deposed to address them. These documents should have been produced long ago.

We all heard you fighting with Mr. Bose when he didn't come to the conference as allegedly instructed, and I bet that was not the first time you threatened to withdraw as his counsel. And while I understand that you likely don't want to produce him because of that and other things, you have to. Mr. Bose's deposition was unilaterally scheduled to get it on the books. Please get me dates that work for you and Mr. Bose and we will work to accommodate those dates.

Finally, we are not in "settlement mode." I am happy to inform Judge Slomsky and Judge Wells that there are no settlement discussions occurring and that we intend to finish discovery before the next pre-trial conference so that we can get a trial date.

THE BEASLEY FIRM, LLC

  
JAMES E. BEASLEY, JR.

JBj/rmd